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IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF UTAH
CENTRAL DIVISION

JESSE ANNE MAJORS, Plaintiff, v. THOMAS JEFFERSON SCHOOL OF LAW, et al, Defendants.	RESPONSE TO MOTION TO DISREGARD RULE 7.1 DISCLOSURES [DKT# 74] Case No.: 2:11cv00558 CW
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The comment to Rule 7.1 Fed. R. Civ. P. explains that the purpose of Rule 7.1 is to allow the court to determine whether there is any relationship requiring recusal of any judge to whom a matter may be assigned. Plaintiff's assumptions as to the purpose of the Rule and how the court should treat this disclosure in this case are without legal or factual support.

In *Chambers v. NASCO*, 501 U.S. 32 (1991), the court upheld a trial court's award of attorneys' fees against a party who had repeatedly taken actions which were without merit and

which delayed the proceedings. These attorneys' fees were awarded against the party individually. The test for awarding attorneys fees is objective. Defendant moves the court for an award of attorneys' fees expended in association with this baseless motion.

DATED this 1st day of November, 2011.

/s/ Robert H Wilde
ROBERT H. WILDE
Attorney for Defendant Thomas Jefferson School of Law

Delivery Certificate

I hereby certify that I caused a true and correct copy of the foregoing Memorandum to be served by the method(s) indicated below and addressed to the following on this this 1st day of November, 2011.

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/s/ Robert H Wilde